

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireless E911 Location Accuracy	)	PS Docket No. 07-114
Requirements	)	
	)	
	)	

To: The Commission

**EXCLUSION REPORT  
BUG TUSSEL WIRELESS, LLC**

Bug Tussel Wireless, LLC (“BTW”), as spectrum manager, and pursuant to section 20.18(h)(1)(vi) of the Rules and Regulations of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> and the Order released June 28, 2011 in the above-referenced docket,<sup>2</sup> hereby notifies the Commission of the exclusion of certain areas from compliance with the network-based E911 Phase II location accuracy standards.<sup>3</sup> BTW is a Tier III mobile wireless carrier providing service in rural Wisconsin. BTW provides service pursuant to licenses held by affiliated license holding companies and pursuant to a spectrum management and build out agreement with AT&T Wireless. BTW uses a network-based solution to implement Phase II E911 on its Global System for Mobile Communications (“GSM”) system.

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<sup>1</sup> 47 C.F.R. § 20.18(h)(1)(vi).

<sup>2</sup> *In re Wireless E911 Location Accuracy Requirements*, Order, DA 11-1125 (rel. June 28, 2011) (“*Exclusion Report Order*”) (providing clarification and extending the filing deadline to July 28, 2011).

<sup>3</sup> Copies of this Exclusion Report are being sent to the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, and the National Association of State 9–1–1 Administrators pursuant to the *Exclusion Report Order* and rule 20.18(h)(1)(vi).

BTW is excluding the following counties in the state of Wisconsin because there are an insufficient number of cell sites in these areas to support network-based triangulation:

Adams County

Brown County

Buffalo County

Calumet County

Columbia County

Dane County

Dodge County

Green County

Green Lake County

Iowa County

Jackson County

Juneau County

Kewaunee County

LaCrosse County

Manitowoc County

Marquette County

Monroe County

Outagamie County

Portage County

Richland County

Sauk County

Sheboygan County

Trempealeau County

Vernon County

Wood County

BTW also is excluding portions of the following Wisconsin counties:

Door County: The City of Sturgeon Bay, the Village of Ephraim and the Townships of Liberty, Egg Harbor, Nasewaupee and Baileys Harbor.

Waupaca County: The Village of Clintonville.

Waushara County: The Townships of Oasis and Rose and the Village of Wild Rose.

Dated: July 28, 2011

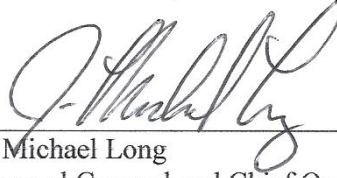
# **DECLARATION OF J. MICHAEL LONG**

I, J. Michael Long, do hereby declare under penalty of perjury the following:

I am the General Counsel and Chief Operating Officer of Bug Tussel Wireless, LLC.

I am the officer having chief oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) of the FCC's Rules.

I have read the foregoing "Exclusion Report" of Bug Tussel Wireless, LLC dated July 28, 2011. I have personal knowledge of the facts set forth therein, and I believe them to be true and correct.



J. Michael Long  
General Counsel and Chief Operating  
Officer  
130 E. Walnut Street  
Green Bay, WI 54305  
920-940-0139

*July 28, 2011*

Date